

Exhibit A

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR

IMMACULATA GUARNA-ARMSTRONG

Pursuant to the authority of 28 U.S.C. § 1746, I, Immaculata Guarna-Armstrong the Assistant Field Office Director for U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, Burlington, Massachusetts declare as follows:

1. I am an Assistant Field Office Director (“AFOD”) for U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE ERO Boston”).
2. I have served as an AFOD for approximately eight (8) years. Prior to holding my current position, I served as Supervisory Detention and Deportation Officer four (4) years.
3. Included in my official duties as an AFOD for ICE ERO Boston is the responsibility for managing and monitoring the ICE ERO Boston’s roster of aliens who are detained for purposes of removal proceedings as well as effectuation of final orders of removal.
4. I have experience utilizing ICE record systems to obtain information regarding specific aliens. ICE maintains electronic and paper records on aliens in the course of its regularly conducted business activity. These records are made in the course of regularly conducted business activity at or near the time of relevant events by a person with knowledge of these events. This declaration is based upon my personal knowledge, information obtained from other individuals employed by ICE, and information obtained from ICE records.
5. I am aware of the facts and circumstances of the Court’s November 27, 2019 memorandum and order regarding Plaintiffs’ motion for summary judgement. I am

aware that this Court allowed in part and denied in part the Plaintiffs' requested declaratory and injunctive relief. Specifically, I am aware that this Court ordered that the Government provide the Court's order regarding the declaratory judgement and permanent injunction to all members of both the Pre-Hearing Class and the Post-Hearing Class by December 13, 2019. Further, I am aware that this Court ordered the Government to provide the Court's order regarding the declaratory judgement and permanent injunction to all new members of the Pre-Hearing Class once ICE makes the initial determination to detain them pursuant to 8 U.S.C. § 1226(a).

6. To facilitate compliance with the Court's November 27, 2019 order, ICE ERO Boston took the following steps at my direction.
 7. On December 3, 2019, I directed officers within the ICE ERO Boston detained unit to compile a report of all aliens detained pre-final order of removal within the jurisdiction of the Boston Immigration Court.
 8. On December 4, 2019, I provided a report of all aliens detained pre-final order of removal within the jurisdiction of the Boston Immigration Court to ICE's Office of the Principal Legal Advisor – Boston ("OPLA Boston") for their review of potential Brito Pre-Hearing and Post-Hearing class members at that time.
 9. On December 10, 2019, OPLA Boston provided ICE ERO Boston with a report of potential Brito class members. I then directed officers within ICE ERO Boston to personally serve the class members with this Court's order regarding the declaratory judgement and permanent injunction.

10. ICE ERO Boston served all of these Brito class members with this Court's order regarding the declaratory judgement and permanent injunction by the end of the day on December 13, 2019.

11. Additionally, in compliance with the Court's November 27, 2019 order, ICE ERO Boston has been serving this Court's order regarding the declaratory judgement and permanent injunction on all new members of the Pre-Hearing class once ICE ERO Boston makes the initial determination to detain them pursuant to 8 U.S.C. § 1226(a) or upon an alien transferring into ICE ERO Boston's custody if such a detention determination was made by an officer or agent from U.S. Customs and Border Protection or by an officer or agent from a different ICE office outside of ICE ERO Boston's area of responsibility.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on the Sixteenth day of December, 2019



Immaculata Guarna-Armstrong
Assistant Field Office Director
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Burlington, Massachusetts